

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORKJoyce PARKS

(In the space above enter the full name(s) of the plaintiff(s).)

-against-

New York City Police Department  
Prestige Management Inc  
Madison Security Group, Inc

(In the space above enter the full name(s) of the defendant(s). If you cannot fit the names of all of the defendants in the space provided, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed in the above caption must be identical to those contained in Part I. Addresses should not be included here.)

**I. Parties in this complaint:**

- A. List your name, identification number, and the name and address of your current place of confinement. Do the same for any additional plaintiffs named. Attach additional sheets of paper as necessary.

Plaintiff's

Name

Joyce PARKS

ID#

N/A

Current Institution

N/A

Address

101 West 147th Street, Apt 46  
NEW YORK, N.Y. 10039

- B. List all defendants' names, positions, places of employment, and the address where each defendant may be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption. Attach additional sheets of paper as necessary.

Defendant No. 1

Name

Detective Heriberto Vazquez Shield # UNKNOWN

Where Currently Employed

New York City Police Dept

Address

250 West 135th Street  
NEW YORK N.Y. 10030**AMENDED  
COMPLAINT**under the Civil Rights Act,  
42 U.S.C. § 1983Jury Trial: ☐ Yes ☐ No  
(check one)16 Civ. 2072 (LAP)
 RECEIVED  
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2016 MAY 19 PM 1:42  
S.D. OF N.Y.

UNKNOWN  
(female)

Defendant No. 2

Name

Detective Rivera

Shield #

(female)

Where Currently Employed

New York City Police Dept

Address

250 West 135th Street

New York NY 10030

Defendant No. 3

Name

Detective John Doe

Shield #

UNKNOWN

Where Currently Employed

New York City Police Dept

Address

250 West 135th Street

New York NY 100

Who did  
what?

Defendant No. 4

Name

Robert James

Shield #

N/A

Where Currently Employed

Madison Security Group

Address

2931 Westchester Avenue

Bronx, NY 10461

Defendant No. 5

Name

Orlando Osorio

Shield #

N/A

Where Currently Employed

Preshge Management

Address

1200 Zerega Avenue

Bronx, New York 10462

**II. Statement of Claim:**

State as briefly as possible the facts of your case. Describe how each of the defendants named in the caption of this complaint is involved in this action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Attach additional sheets of paper as necessary.

A. In what institution did the events giving rise to your claim(s) occur?

This event occurred at the Plaintiff's Residence

B. Where in the institution did the events giving rise to your claim(s) occur?

Plaintiff's Residence

C. What date and approximate time did the events giving rise to your claim(s) occur?

This event occurred on February 24, 2016 at approximately 6 pm

D. Facts: On the date and time listed in section II,

the above defendants entered the Plaintiff's apartment (trespassed) and conducted a unlawful search of the Plaintiff's residence without

What  
happened  
to you?

Was  
anyone  
else  
involved?

a search warrant, thereby violating defendant's Fourth Amendment rights. Defendants No. 4 and No. 5 although private parties jointly engaged in joint activity with the police department by unsecuring Plaintiff's secured apartment, thereby allowing the police department access to Plaintiff's residence. Defendants No. 4 and 5 also engaged in state actions by breaking and entering into residence of Plaintiff with authorization. Defendant No. 4 and No. 5 acted in conjunction with the Police Department in order to violate Plaintiff's Fourth Amendment Rights. All Defendants listed in this case trespassed (illegally) into Plaintiff's residence without a search warrant.

Who else  
saw what  
happened?

### III. Injuries:

If you sustained injuries related to the events alleged above, describe them and state what medical treatment, if any, you required and received.

Plaintiff suffered emotional distress. The Defendants abused their power thereby causing Plaintiff to feel less than and violated by Defendants. Mental abuse as well as emotional abuse were the injuries sustained. All Defendants in this case are guilty of violating Plaintiff's constitutional rights.

### IV. Exhaustion of Administrative Remedies:

The Prison Litigation Reform Act ("PLRA"), 42 U.S.C. § 1997e(a), requires that "[n]o action shall be brought with respect to prison conditions under section 1983 of this title, or any other Federal law, by a prisoner confined in any jail, prison, or other correctional facility until such administrative remedies as are available are exhausted." Administrative remedies are also known as grievance procedures.

A. Did your claim(s) arise while you were confined in a jail, prison, or other correctional facility?

Yes ☐ No ☒



If YES, name the jail, prison, or other correctional facility where you were confined at the time of the events giving rise to your claim(s).

N/A

B. Does the jail, prison or other correctional facility where your claim(s) arose have a grievance procedure?

Yes \_\_\_ No \_\_\_ Do Not Know \_\_\_

N/A

C. Does the grievance procedure at the jail, prison or other correctional facility where your claim(s) arose cover some or all of your claim(s)?

Yes \_\_\_ No \_\_\_ Do Not Know \_\_\_

N/A

If YES, which claim(s)?

D. Did you file a grievance in the jail, prison, or other correctional facility where your claim(s) arose?

Yes \_\_\_ No \_\_\_

N/A

If NO, did you file a grievance about the events described in this complaint at any other jail, prison, or other correctional facility?

Yes \_\_\_ No \_\_\_

E. If you did file a grievance, about the events described in this complaint, where did you file the grievance?

N/A

1. Which claim(s) in this complaint did you grieve?

N/A

2. What was the result, if any?

N/A

3. What steps, if any, did you take to appeal that decision? Describe all efforts to appeal to the highest level of the grievance process.

N/A

F. If you did not file a grievance:

1. If there are any reasons why you did not file a grievance, state them here:

N/A

2. If you did not file a grievance but informed any officials of your claim, state who you informed, when and how, and their response, if any:

N/A

- G. Please set forth any additional information that is relevant to the exhaustion of your administrative remedies.

N/A

Note: You may attach as exhibits to this complaint any documents related to the exhaustion of your administrative remedies.

**V. Relief:**

State what you want the Court to do for you (including the amount of monetary compensation, if any, that you are seeking and the basis for such amount).

Plaintiff is asking the courts to order Defendant No. 5 (Prestige management) to relocate Plaintiff from her current residence. Plaintiff is asking Defendants No. I, No. II, No. III to replace Plaintiff front door until she can be relocated. Plaintiff is asking for monetary compensation for emotional distress. Plaintiff's Fourth Amendment Right to be free secure in her residence was violated. Monetary compensation requested in order to relocate. Punitive damages are also being requested from all defendants.

Monetary Compensation is requested from all defendants in this case. Plaintiff is asking courts to order all of the defendants to financially compensate plaintiff with relocating from her current residence.

On these claims

VI. Previous lawsuits:

A. Have you filed other lawsuits in state or federal court dealing with the same facts involved in this action?

Yes \_\_\_ No Y

B. If your answer to A is YES, describe each lawsuit by answering questions 1 through 7 below. (If there is more than one lawsuit, describe the additional lawsuits on another sheet of paper, using the same format.)

1. Parties to the previous lawsuit:

Plaintiff \_\_\_\_\_  
Defendants \_\_\_\_\_

2. Court (if federal court, name the district; if state court, name the county) \_\_\_\_\_

3. Docket or Index number \_\_\_\_\_

4. Name of Judge assigned to your case \_\_\_\_\_

5. Approximate date of filing lawsuit \_\_\_\_\_

6. Is the case still pending? Yes \_\_\_ No \_\_\_

If NO, give the approximate date of disposition \_\_\_\_\_

7. What was the result of the case? (For example: Was the case dismissed? Was there judgment in your favor? Was the case appealed?) \_\_\_\_\_

On other claims

C. Have you filed other lawsuits in state or federal court otherwise relating to your imprisonment?

Yes \_\_\_ No \_\_\_ N/A

D. If your answer to C is YES, describe each lawsuit by answering questions 1 through 7 below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same format.)

1. Parties to the previous lawsuit:

Plaintiff \_\_\_\_\_  
Defendants N/A

2. Court (if federal court, name the district; if state court, name the county) \_\_\_\_\_

3. Docket or Index number \_\_\_\_\_

4. Name of Judge assigned to your case \_\_\_\_\_

5. Approximate date of filing lawsuit \_\_\_\_\_

6. Is the case still pending? Yes \_\_\_\_ No X N/A  
If NO, give the approximate date of disposition \_\_\_\_\_
7. What was the result of the case? (For example: Was the case dismissed? Was there judgment in your favor? Was the case appealed?) \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 19 day of May, 2016

Signature of Plaintiff

Inmate Number

Institution Address

Plaintiff address

J. Pank  
101 West 147th #46  
Nyc, ny 10039

Note: All plaintiffs named in the caption of the complaint must date and sign the complaint and provide their inmate numbers and addresses.

I declare under penalty of perjury that on this 19 day of May, 2016 I am delivering this complaint to prison authorities to be mailed to the *Pro Se* Office of the United States District Court for the Southern District of New York.

Signature of Plaintiff:

J. Pank